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16  
 17 **IN THE UNITED STATES DISTRICT COURT**  
 18 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

19 **GENA HANSON**, individually and on behalf of )  
 20 all others similarly situated, )  
 21 )  
 Plaintiff, )  
 22 )  
 v. )  
 23 )  
**JQD, LLC, d/b/a PRO SOLUTIONS**, a )  
 24 California corporation; )  
 25 )  
 Defendant. )  
 26 )

Case No. 4:13-cv-05377-RS

**JOINT STIPULATION TO CONTINUE**  
**DISCOVERY CUT-OFF AND ~~[PROPOSED]~~**  
**ORDER**

Courtroom: 3  
 Judge: Hon. Richard Seeborg

27  
 28 **JOINT STIPULATION TO CONTINUE DISCOVERY CUT-OFF AND [PROPOSED]**  
**ORDER; Case No. 4:13-cv-05377-RS**

WHEREAS Plaintiff Gena Hanson, individually and on behalf of others similarly situated, and Defendant JQD, LLC, d/b/a/ Pro Solutions, (collectively, the “Parties”) have been engaging in settlement discussions;

WHEREAS the Parties are attempting to schedule a mediation during the month of January or February;

WHEREAS the Parties have focused their time and resources towards resolution over the past three months;

WHEREAS the Parties do not anticipate being able to complete non-expert discovery by the current discovery cut-off of February 6, 2015.

NOW, THEREFORE, the Parties hereby STIPULATE to continue the non-expert discovery cut-off by one hundred twenty one (121) days to June 7, 2015 (the same day as the expert discovery cut-off). All other dates previously set by the Court will remain unchanged.

Respectfully submitted,  
Dated: January 12, 2015

**COTCHETT, PITRE & McCARTHY, LLP**

By: /s/ Justin T. Berger  
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JUSTIN T. BERGER  
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*Attorneys for Plaintiff and the Proposed Class*

Dated: January 12, 2015

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

By: /s/ Stephen H. Turner  
STEPHEN H. TURNER

*Attorneys for Defendant JQD, LLC d/b/a  
PRO SOLUTIONS*

~~PROPOSED~~ ORDER

Pursuant to the STIPULATION of the Parties, it is hereby ordered that the discovery cut-off be extended one hundred twenty one (121) days from February 6, 2015, to June 7, 2015.

IT IS SO ORDERED.

DATED: 1/13/15



Honorable Richard Seeborg  
Judge for the United States District Court